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Richard Bagdasarian INC.

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November 23, 2005

Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs, AMS, USDA
1400 Independence Ave, SW
Stop 0237
Washington, DC 20250

Gentlemen:

Re: Proposed Change in Regulatory
Periods for Table Grapes, Coachella Valley
Docket No. FV03-925-1PR
Federal Register Notices of May 25, 2005, p. 30001;
July 25, 2005, p. 42513; and September 27, 2005, p. 56378

I am writing in support of the rule recommended by the Desert Grape Growers League of California to change the regulatory date of the federal marketing order to April 1. This action is extremely important to continue providing consumers with the best table grapes possible.

It took Coachella Valley growers twenty years to establish themselves as quality growers and shippers of table grapes, and this was accomplished by imposing strict standards upon ourselves.

Unfortunately, our industry has been harmed by shipments of imported table grapes just prior to the current effective date (April 20) of the marketing order whose condition and quality is below that stipulated in the order. When this happens, it casts a negative economic effect on our industry because consumers are turned away from future purchases of grapes. This situation must not be countenanced in the future because it will cause the demise of our industry.

In 1988, a federal court issued a ruling noting that marketing orders are designed to "embrace all conditions that will impact on price and supply fluctuations..." Our industry has been hurt in the last few years by imported table grapes that have in fact impacted our domestic price. The consumer cannot distinguish between imported and domestic grapes unless, of course, the product contains an indication of country of origin. Therefore, the recommendation of the Desert Grape Growers League to move forward the effective date of the marketing order must be put into effect.

BAGDAD

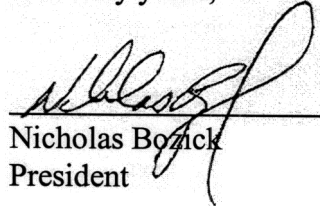
Mr. Grape

PASHA

Allowing Chilean grapes which are of an inferior quality when they reach our consumers will not only harm the reputation of the Chilean grower but ours also and that of table grapes in general.

Thank you for your consideration of these comments.

Sincerely yours,



Nicholas Bozick
President